

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

ELECTRONICALLY FILED 5/6/08

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REBECCA SHANKS,

Plaintiff,

Civil Action No. 07-CV-7253

FRCP Rule 26 (a) Disclosure

-against-

UNITED STATES OF AMERICA, PETER ODIN, and
CONMUR CAB CORP.,

Defendants.
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. Plaintiff, REBECCA SHANKS, by and through her attorney, Steven B. Kaufman, as and
for her FRCP Rule 26 (a) Disclosure hereby sets forth the following:

1. The witnesses to the September 27, 2004 accident are:

Michael Berlanshik 1089 East 72nd St. Brooklyn, NY 11234, Phone No. Unknown
Peter Odin 277 West 127th St., 10 F New York, NY 10027, Phone No. Unknown
Rebecca Shanks 651 Anderson Road Jackson, NJ 08527, Phone No. 732 276-6853

Additionally, as a result of the accident plaintiff received extensive medical treatment. HIPPA
compliant authorizations for all medical providers will provided forthwith.

2. Plaintiff is in possession of extensive hospital and medical records pertaining to treatment.

3. Damages are computed as follows: \$13,000,000.00 for past pain and suffering and loss of
enjoyment of life; \$6,000,000.00 for future pain and suffering and loss of enjoyment;
\$275,000.00 for past lost earnings; \$725,000.00 for future lost earnings. Employment records
available through authorization to be provided forthwith.

4. Plaintiff is not in possession of any insurance agreement under which an insurance business
my be liable to satisfy all or part of a possible judgment in the action or to indemnify or
reimburse for payments made to satisfy the judgment.

S/

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